

REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-17 and 21-23 were under consideration in the application, of which Claims 1, 12, and 21 are independent. Claims 18-20 have been previously withdrawn from consideration. In the Office Action dated July 2, 2007, Claims 1-11 and 21-23 were rejected under 35 U.S.C. § 102(b) and Claims 1-17 and 21-23 were rejected under 35 U.S.C. 103(a). Following this response, Claims 1-17 and 21-23 remain under consideration in this application with Claims 18-20 being canceled without prejudice or disclaimer. Applicant hereby addresses the Examiner's rejections in turn.

I. Interview Summary

Applicant thanks Examiner Nguyen for the courtesy of a telephone interview on October 10, 2007, requested by the undersigned to discuss the rejection of the current claims under 35 U.S.C. §§ 102 and 103. During the interview, Applicants asserted that the cited references do not render obvious the claims as currently amended. Furthermore, the Examiner indicated the currently amended claims appear to at least overcome the cited references. However, the Examiner stated that a further search is needed and no agreement was reached regarding patentability.

II. Rejection of Claims 1-11 and 21-23 Under 35 U.S.C. § 102(b)

In the Office Action dated July 2, 2007, the Examiner rejected Claims 1-11 and 21-23 under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. Pub. No. 2002/0032705, now U.S. Patent No. 7,024,623 ("*Higashiyama*"). Claims 1 and 21 have

been amended, and Applicant respectfully submits that these amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "the plurality of content-based guidelines comprising the following: a gravity parameter defining a distance beyond which the plurality of content-based guidelines are suppressed, vertical lines and horizontal lines defined by an equation of a line." Amended Claim 21 also includes a similar recitation. Support for these amendments can be found in the specification at least on page 4, lines 18-24 and page 15, lines 6-11.

In contrast, *Higashiyama* at least does not disclose the aforementioned recitation from Claim 1. *Higashiyama* merely discloses a rule may be selected based upon collected context information. (See col. 9, line 66-col. 10, line 1.) In *Higashiyama*, a rules database may be maintained by a word processor program module. (See col. 10, lines 1-3.) *Higashiyama*'s rules may have an associated trigger that indicates that the rule is to be applied to alter electronic document free formatting. (See col. 10, lines 3-6.) The trigger may typically be a attribute specific set, or context information that indicates that the rule is appropriate to apply. (See col. 10, lines 6-8.) Thus, in *Higashiyama*, when a specific context information set is collected, a specific rule may be selected. (See col. 10, lines 8-10.) Accordingly, *Higashiyama* merely discloses selecting rules based on a context information set. Consequently, *Higashiyama* does not disclose a content-based guidelines comprising a gravity parameter defining a distance beyond for suppressing the content-based guidelines and vertical lines and

horizontal lines defined by an equation of a line. Rather, *Higashiyama* is silent regarding suppressing content-based guidelines and line equations.

Higashiyama does not anticipate the claimed invention because *Higashiyama* at least does not disclose "the plurality of content-based guidelines comprising the following: a gravity parameter defining a distance beyond which the plurality of content-based guidelines are suppressed, vertical lines and horizontal lines defined by an equation of a line," as recited by amended Claim 1. Amended Claim 21 includes a similar recitation. Accordingly, independent Claims 1 and 21 each patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claims 1 and 21.

Dependent Claims 2-11 and 22-23 are also allowable at least for the reasons described above regarding independent Claims 1 and 21, and by virtue of their respective dependencies upon independent Claims 1 and 21. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 2-11 and 22-23.

III. Rejection of Claims 12-17 Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claims 12-17 under 35 U.S.C. § 103(a) as being unpatentable over *Higashiyama* in view of U.S. Pat. Pub. No. 2002/0064308 now U.S. Patent No. 6,587,587 ("*Altman*"). Claim 12 has been amended, and Applicant respectfully submits that the amendment overcomes this rejection and adds no new matter.

Amended Claim 12 is patentably distinguishable over the cited art for at least the reason that it recites, for example, “the content guideline being selected from a plurality of content-based guidelines comprising the following: a gravity parameter defining a distance beyond which the plurality of content-based guidelines are suppressed, vertical lines and horizontal lines defined by an equation of a line stored on the computer-readable storage device.” Support for this amendment can be found in the specification at least on page 4, lines 18-24 and page 15, lines 6-11.

In contrast, *Higashiyama* at least does not disclose the aforementioned recitation from Claim 12. *Higashiyama* merely discloses a rule may be selected based upon collected context information. (See col. 9, line 66-col. 10, line 1.) In *Higashiyama*, a rules database may be maintained by a word processor program module. (See col. 10, lines 1-3.) *Higashiyama*’s rules may have an associated trigger that indicates that the rule is to be applied to alter electronic document free formatting. (See col. 10, lines 3-6.) The trigger may typically be a attribute specific set, or context information that indicates that the rule is appropriate to apply. (See col. 10, lines 6-8.) Thus, in *Higashiyama*, when a specific context information set is collected, a specific rule may be selected. (See col. 10, lines 8-10.) Accordingly, *Higashiyama* merely discloses selecting rules based on a context information set. Consequently, *Higashiyama* does not disclose a content-based guidelines comprising a gravity parameter defining a distance beyond for suppressing the content-based guidelines and vertical lines and horizontal lines defined by an equation of a line. Rather, *Higashiyama* is silent regarding suppressing content-based guidelines and line equations.

Furthermore, *Altman* does not overcome *Higashiyama*'s deficiencies. For example, *Altman* merely discloses spacing, storing, and recognizing electronic handwriting representations. (See Abstract.) Consequently, *Altman* does not disclose a content-based guidelines comprising a gravity parameter defining a distance beyond for suppressing the content-based guidelines and vertical lines and horizontal lines defined by an equation of a line. Rather, *Altman* merely discloses recognizing electronic representations of handwritten text and is silent regarding suppressing the content-based guidelines and equations of a line.

Combining *Higashiyama* with *Altman* would not have led to the claimed invention because *Higashiyama* and *Altman*, either individually or in combination, at least do not disclose or suggest "the content guideline being selected from a plurality of content-based guidelines comprising the following: a gravity parameter defining a distance beyond which the plurality of content-based guidelines are suppressed, vertical lines and horizontal lines defined by an equation of a line stored on the computer-readable storage device," as recited by amended Claim 12. Accordingly, independent Claim 12 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claim 12.

Dependent Claims 13-17 are also allowable at least for the reasons described above regarding independent Claim 12, and by virtue of their dependency upon independent Claim 12. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 13-17.

IV. Conclusion

In view of the foregoing remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this amendment and charge any additional required fees to our Deposit Account No. 13-2725.

Respectfully submitted,
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Date: November 2, 2007

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